

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 6646
APPLICANT NAME: Inyo County Water Department
PROJECT TITLE: Implementation of LORP, Invasive Species Control, & Land Management Improvement in Owens Valley
FUNDS REQUESTED: \$20,075,430
COST MATCH: \$ 7,387,137
TOTAL PROJECT COST: \$27,462,567

DESCRIPTION: The Owens Valley Integrated Regional Water Management Plan is the compilation of existing planning documents and binding commitments to manage Owens Valley waters and its environment, and promote efficient water management. The four projects contained in this proposal implement environmental restoration and enhancement projects, control invasive species to protect habitat and water quality, and construct infrastructure necessary to effectively manage grazing in riparian habitats to protect water quality.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Fail

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1.

The collection of documents said to comprise the adopted FED do not meet the IRWMP Minimum Standards. The applicant uses the proposal along with submitted attachments in lieu of a proper IRWMP umbrella document. A schedule for adoption of the FED/IRWMP by January 1, 2007 is not shown. Inyo County Res. No. 2005-35 (Attachment 1) does not mention the IRWMP, nor does the County counsel letter (Attachment 2). Other letters support the grant request, but none adopt or approve the IRWMP (Attachment 3). Attachment 3 states the IRWMP consists of existing planning documents and legal commitments, then lists and includes them. Attachment 4 states: all components of the plan have been adopted by the participants, and proof of formal adoption is included in Attachment 3. (answer continued in question 22)

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1.

Description of region is included in Attachment 5 with maps in Attachment 6 & 3. Many of the criterion questions were addressed in applicant's EIR and Inyo County general plan, Chapter 2. Lacks details relating to specific criterion of explanation of why the region is appropriate for regional management. Note: The EIR listed as part of the IRWMP is dated 1991, but the EIR in Attachment 3/FAAST is a September 1990 draft. Another problem is that Attachments 5 and 4 should only indicate where in Attachment 3 each of the criterion standards are located, not present information that belongs in an IRWMP or FEP.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1.

Brief overview of objectives included in Attachment 5, water management goals are described in MOU, and environmental objectives described in urban water management plan. Objectives are not presented clearly in a regionwide integrated approach but more relating to each individual plan's objectives. Applicant did not adequately tie these objectives back into a comprehensive approach and discuss how the individual objectives of each plan leads to greater integrated water management and benefits. The criterion is less than fully addressed and documentation/rationale is insufficient. Attachments 5 and 4 should only indicate where in Attachment 3 each of the criterion standards are located, not present information that belongs in a single integrated plan adopted by all the parties, which does not exist.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1.

Water management strategies (WMS) and integration was discussed in Attachments 4, 5, and more specifics in individual plans. Applicant discusses how their plans provide a wide range of WMS, but specific details and a lack of integration discussion is much needed. Applicant does not discuss WMS that did not apply and provided brief details on the added benefits of integration of multiple WMS. Attachments 5 & 4 should only indicate where in Attachment 3 each of the criterion standards are located, not present information that belongs in a single integrated plan adopted by all the parties, which does not exist.

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Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.

Description of regional implementation priorities is brief, and they did not identify short-term and long-term implementation priorities. Attachment 3 text does not describe priorities of the region, but Table 1 in Attachment 3 lists projects. There is no breakdown of short and long term priorities or project sequencing in Attachment 3; the Lower Owens River Project Plan has non-specific short and long term water supply planning sections. Attachments 4 and 5 both discuss priorities generically, but again, they are supposed to indicate where to find information in an IRWMP adopted by all parties in Attachment 3, not augment Attachment 3. Attachments 4 and 5 state that all management provisions and environmental projects specified in the Agreement and MOU are required to be completed under court order discharging the litigation, but this does not preclude project implementation prioritization.

Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

The applicant presents information in Attachments 5, 8, & 3 - table 1. The agreement/MOU, whose components & provisions define the FEP, has been implemented. Individual projects have been implemented or are in the process of being implemented. Applicant could have scored better by discussing linkages or interdependence between projects and also providing more details on economic & technical feasibility of projects.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

The applicant provides details in Attachments 5, 10, EIR, & urban water management plan; negative impacts covered in EIR. Income levels were discussed in EIR and Inyo County general plan but no details of how projects will help DACs. Attachment 3 text does not address impacts and regional benefits of the IRWMP. Attachment 5 addresses the subject to some extent, but should indicate where to find the information in Attachment 3 rather than augment Attachment 3. Attachment 5 refers reviewers to the EIR, which misses the point: The EIR addresses impacts on the Owens Valley from L.A.'s water exports via the second aqueduct constructed in 1970, whereas, this scoring criterion asks applicants to describe impacts from implementation of the IRWMP.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

Technical Analysis and Plan Performance details are in Attachments 5, 6 (individual projects), and Greenbook.'s Research in this area has been conducted and described since the 1980s. Because documents submitted are descriptive and were not developed as an IRWMP, data gaps are not clearly documented, but these might be discussed in the Technical Group and Steering Committee as the need arises. The FEP is being defined in terms of "existing planning documents and binding commitments" that are already in place and prescribe methods to evaluate and adapt operation.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

Attachment 5 provides the discussion. Data will be disseminated through websites and the county Supervisors' meetings. Monitoring efforts of water supply and water quality have been addressed through the LA/Inyo County Agreement up until 1997, to 2000 by the Inyo County general plan, and to 2004 by the urban management plan. However, how data collection will support statewide data needs and how data will be integrated into SWAMP and GAMA program were not specifically addressed.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

Attachment 5 & MOU provides details of Financing for projects. The majority of funding for projects is to come from Los Angeles Department of Water and Power, especially for environmental enhancement projects. Applicant does note that outside sources would contribute to budget. Attachment 6 states that outside funding has been obtained for implementation of several plan provisions that will be applied as matching funds should this application be successful. Applicant does not discuss in detail of long-term funding for O&M on projects. It is required that the projects maintain a 20-year sustainability/life span in order to be funded by this grant program. However, ongoing support for projects is mandated by court, not only by planning efforts.

Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

Attachment 3 text does not discuss how identified actions, projects, or studies relate to planning documents established by local agencies, but it is discussed elsewhere. Applicant provides a discussion of local planning in Attachment 5. Nor does Attachment 3 text discuss how local agency planning documents relate to the IRWM water management strategies, but Attachment 6 does to some extent. Attach 5 (& 4) should only indicate where in Attachment 3 each of the criterion standards are located, not augment Attachment 3 by presenting information that belongs in a single integrated plan adopted by all the parties, which does not exist.

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Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

Discussion found in Attachments 5, 3, & DACs in Attachment 10. The applicant's FEP resulted from settlement of litigation involving multiple agencies, non-profits and stakeholders, thus, local involvement and coordination was evident. Environmental justice concerns were not addressed specifically in Attachment 5. DACs were discussed, but how they will specifically participate in the planning was not.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match. Pass or Fail.

Question: Description of Proposal. Weighting factor is 3.

The applicant provides a discussion in Attachment 6. The criterion is fully addressed with thorough and well-presented documentation that includes discussions on regional water management strategies, prioritization, project integration, relationship to IRWMP, project linkages, water source protection and water quality.

Question: Project Prioritization. Weighting factor is 2.

The applicant provides a discussion in Attachment 6. The criterion is fully addressed with thorough and well-presented documentation. See question 15 for discussion of topics.

Question: Cost Estimate. Weighting factor is 1.

Applicant profiles all four of its projects costs in Attachment 7. The applicant did a good job addressing the entire criterion and provided a discussion on each project.

Question: Schedule. Weighting factor is 1.

The applicant presents the schedule in Attachment 8. The criterion is fully addressed with thorough and well-presented documentation.

Question: Need. Weighting factor is 2.

The applicant discusses these criteria in Attachment 9 along with elements of the Agreement/MOU and other components of FEP.

Question: Disadvantaged Communities. Weighting factor is 2.

Applicant provides DAC discussion in Attachment 10. Attachment 10 states that most census blocks/DACs are located nearest the largest project, the LORP, and the local economy will benefit as a result. However, no specific direct benefits to DACs were identified and scoring of this criterion is based on the degree DACs will benefit from the projects, which remains unknown.

Question: Program Preferences. Weighting factor is 1.

Applicant provides program preferences in Attachment 11. The proposal addresses 3 of 5 program preferences in Section II. E of the IRWM guidelines. The applicant has demonstrated that multiple proposed projects have an integrated approach with multiple benefits/program preferences. The applicant's proposal lacked an in depth-discussion of program preferences related to safe drinking water and water quality projects that serve disadvantaged communities and any details to reduce pollution in impaired waters and sensitive habitats areas.

TOTAL SCORE: DISQUALIFIED
